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UBIQUITI NETWORKS, INC. and
9 UBIQUITI NETWORKS
INTERNATIONAL LIMITED

10

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 SYNOPSYS, INC.,

15 Plaintiff,

16 v.

17 UBIQUITI NETWORKS, INC., UBIQUITI
18 NETWORKS INTERNATIONAL LIMITED,
CHING-HAN TSAI, and DOES 1-20,
inclusive

19 Defendants.

20 Case No. 3:17-cv-00561-WHO (LB)

21

22 **UBIQUITI DEFENDANTS'**
NOTICE AND MOTION FOR
MORRISON & FOERSTER LLP
TO WITHDRAW AS COUNSEL OF
RECORD FOR DEFENDANT
CHING-HAN TSAI

23 Date: May 9, 2018

Time: 2:00 p.m.

Place: Courtroom 2, 17th Floor

Judge: Honorable William H. Orrick

24 UBIQUITI NETWORKS, INC. and UBIQUITI
25 NETWORKS INTERNATIONAL LIMITED,

26 Counterclaimants,

27 v.

28 SYNOPSYS, INC.,

Counterdefendant.

NOTICE OF MOTION

2 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

3 PLEASE TAKE NOTICE that on Wednesday, May 9, 2018, at 2:00 p.m., or as soon as
4 the matter may be heard by the Honorable William H. Orrick in Courtroom 2 of the United States
5 District Court for the Northern District of California, 450 Golden Gate Avenue, San Francisco,
6 CA 94102, Defendants and Counterclaimants Ubiquiti Networks, Inc. and Ubiquiti Networks
7 International Limited (“Ubiquiti”) will and hereby do move this Court pursuant to Civil Local
8 Rule 11-5 for an Order permitting Jennifer Lee Taylor, Stacey M. Sprenkel, Joyce Liou,
9 Christopher Robinson, and Amanda D. Phillips of Morrison & Foerster LLP to withdraw as
10 attorneys of record for Defendant Ching-Han Tsai.

11 This motion is based on this Notice of Motion and Motion; the Declaration of Jennifer Lee
12 Taylor in Support of the Motion; and such other written or oral argument as may be presented
13 before this motion is taken under submission by the Court.

STATEMENT OF RELIEF REQUESTED

15 Pursuant to Civil Local Rule 11-5, Ubiquiti respectfully requests an order permitting
16 Jennifer Lee Taylor, Stacey M. Sprenkel, Joyce Liou, Christopher Robinson, and Amanda D.
17 Phillips of Morrison & Foerster LLP to withdraw as attorneys of record for Defendant Ching-Han
18 Tsai.

MOTION

On January 12, 2018, Morrison & Foerster LLP’s engagement to provide legal services to Defendant Ching-Han Tsai in connection with this pending matter was terminated. (Declaration of Jennifer Lee Taylor in Support of Morrison & Foerster’s Motion to Withdraw as Counsel for Ching-Han Tsai (“Taylor Decl.”) ¶ 2.) Morrison & Foerster LLP has continued to represent the two corporate defendants, Ubiquiti Networks, Inc. and Ubiquiti Networks International Limited, in connection with this matter since January 12, 2018. (*Id.* ¶ 3.)

8 On or about January 22, 2018, Mr. Tsai retained The Business Litigation Group, P.C.
9 (“BLG”) to represent him in connection with this matter. (*Id.* ¶ 4.) Two attorneys from BLG—
10 Will Fitton and Marc Bernstein—entered appearances in the matter on January 23, 2018 (Dkt.
11 Nos. 115-116), and have since represented Mr. Tsai at depositions and the Court’s hearings, but
12 the record does not reflect a substitution of counsel as contemplated by Civil Local Rule 11-5.
13 Ubiquiti moves the Court to permit Jennifer Lee Taylor, Stacey M. Sprenkel, Joyce Liou,
14 Christopher Robinson, and Amanda D. Phillips of Morrison & Foerster LLP to withdraw as
15 counsel of record for Defendant Ching-Han Tsai.

16 || Dated: April 2, 2018

MORRISON & FOERSTER LLP

By: /s/ Jennifer Lee Taylor
Jennifer Lee Taylor

Attorneys for Defendants
UBIQUITY NETWORKS, INC. and
UBIQUITY NETWORKS
INTERNATIONAL LIMITED